

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 11-20129

VINCENT WITORT, D-8, *et al.*

Honorable Robert H. Cleland

Defendant.

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**DEFENDANTS SUTHERLAND, McKEOUN, SMITH, DARRAH, VANDIVER, WITORT,  
NELSON, and DROZDOWSKI'S PROPOSED VOIR DIRE**

Pursuant to Local Rule 7.1, undersigned counsel contacted government  
counsel Saima Mohsin regarding concurrence in this Proposal and  
such concurrence was denied on September 22, 2014

NOW COMES Defendants in Trial Group 1, listed above, and respectfully submit  
the following proposed Voir Dire questions:

1. What do you do for a living?
2. Were you raised in a rural, suburban, or urban environment?
3. If married, what does your spouse do for a living? Do you have children?
4. Have you ever served on a jury before, or been involved in any way in a court proceeding?
5. Are you, any relatives or close friends involved in the criminal justice system, including private security, the military, lawyers offices, or the police and fire departments?
6. What is your educational or vocational background?

7. What do you regularly read, watch, or listen to in order to keep abreast of current events?
8. Do you believe that a person charged with a crime must be guilty of something?
9. Have you, a relative, or close friend ever been the victim of a crime?
10. Have you, a relative, or close friend ever been accused of something you did not do?
11. Have you, a relative, or close friend ever belonged to a club or organization that did something you were opposed to?
12. Do you have any impressions about people who ride motorcycles or are members of motorcycle clubs?
13. Do you have any impressions about people who have tattoos?
14. Have you read anything about this case or the Devils' Disciples Motorcycle Club?
15. Have you ever watched the TV series Sons of Anarchy, or shows on other channels about motorcycle clubs such as Gangland? [Need a follow up?]
16. Why do you think people join motorcycle clubs?
17. Is the fact that a person is a member of a motorcycle club going to cause you to believe that the person is more likely to commit a crime? Do drugs?
18. Have you, a relative, or close friend ever been adversely effected by gambling or drugs? If so, how?
19. This case involves allegations of violence. Will those allegations impact upon the way in which you consider the evidence? Will you still hold the government to its burden of proof beyond a reasonable doubt?
20. Would it affect your verdict if a Defendant chose not testify and instead, left the

government to its burden of proof beyond a reasonable doubt?

21. Do you have any problem with the government using a wiretap and listening to people's conversations if it is a court ordered wiretap and otherwise legal under the law?

22. Would you be able to follow the Judge's instructions that a witness is not disqualified from testifying as a witness because he or she has received a benefit for his or her testimony, such as immunity from prosecution, money, or a plea bargain? Will you be able to follow the Judge's instruction that you may consider that benefit together with all the other evidence in determining the witness's credibility?

23. Do you have any strong feelings about the possession of firearms?

24. Do you have any fundamental objections to law enforcement listening to inmates jail conversations?

25. Having hear as much as you have heard about this case, is there anything about the case that would prevent you from being a fair and impartial juror?

Respectfully submitted,

s/ Craig Daly

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CERTIFICATE OF SERVICE

I, Kimberly W. Stout, hereby certify that on the 24<sup>th</sup> day of September 2014, I  
filed TRIAL GROUP 1 DEFENDANTS' PROPOSED VOIR DIRE with the Clerk of the  
Court by e-filing and with notification to all parties.

s/ Kimberly Stout

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